



Joann Needleman
T (215) 640-8536
F (215) 640-8501
Email: JNeedleman@ClarkHill.com

Clark Hill
Two Commerce Square
2001 Market Street, Suite 2620
Philadelphia, PA 19103
T (215) 640-8500
F (215) 640-8501

October 31, 2023

VIA ECF

Honorable Cynthia M. Rufe
United States District Court for the
Eastern District of Pennsylvania
12614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: **Stuff Electronics et al v. For Your Ease Only (FYEO), Inc & Juno Financial, LLC**
Case No. 2:20-cv-43330CMR
Request for Date Certain of Upcoming Trial

Dear Judge Rufe:

The undersigned is counsel for Juno Financial, LLC in the above matter. I am writing on behalf of all counsel regarding the Court's Order assigning this case to the trial pool of January 8, 2024 [Doc No. 59]. The parties and counsel request a date certain for trial for the reasons stated below.

Please be advised that neither the parties nor their counsel have sought a jury trial in this case. The docket reflects that no jury trial has been elected. All parties and their counsel seek a bench trial and the parties believe that a bench trial will take no more than 2-4 days.

Additionally, none of the parties reside in this jurisdiction. At the time the case was commenced, the only party located in this jurisdiction was QVC, who was dismissed from the case over 2½ years ago. Henry Ma, who is the corporate representative for Plaintiff, Stuff Electronics, resides in Hong Kong. Dan Greiner, CFO of FYEO, resides in California and Dennis O'Carroll, CEO of Juno Financial, resides in Colorado. All parties intend to appear in person for trial. These are the only witnesses. A date certain, therefore, will accommodate all parties' travel schedule.

The parties have conferred to discuss respective conflicts. Counsel for Juno will be on a pre-paid vacation through January 9th. Counsel for FYEO is attached for trial in the Delaware Court of Chancery starting January 9, 2024. That trial is expected to take at least three days. Stuff Electronics and its counsel are available for trial during the January 8 trial pool but can accommodate a date change requested by the other parties. The parties have agreed to a

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trial start date of February 27, 2024, March 5, 2024 or March 19, 2024, with Stuff's preference being the earlier date.

The parties and counsel appreciate the Court's consideration in this matter. On behalf of all parties, the undersigned is happy to assist the Court in coordinating a conference call to further discuss same.

Very truly yours,

CLARK HILL



Joann Needleman

JN/dl

Cc: Michael K. Coran (mcoran@klehr.com)
Thomas V. Ayala (tayala@klehr.com)
Justin Stern (jsfern@fmstern.com)
Alejandro Maher (am Maher@fmstern.com)
Andrew P. Carroll (apcarroll@clarkhill.com)